

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT**

**I. HEADING**

**Date:** April 28, 1993  
**From:** Kevin Matheis, On-Scene-Coordinator, *Kevin M Matheis*  
USEPA, REGION II  
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TAT

**Subject:** Frontier Chemical Processes, Inc., Niagara Falls,  
Niagara County, NY - Cyanide, Oxidizers,  
Corrosives, Halogenated & Non-Halogenated Solvents

**POLREP NO:** Seven (7)

**II. BACKGROUND**

<b>SITE/SPILL NO.:</b>	AY
<b>D.O. NO.:</b>	0026-02-036
<b>RESPONSE AUTHORITY:</b>	CERCLA/SARA
<b>NPL STATUS:</b>	Non-NPL
<b>START DATE:</b>	December 21, 1992
<b>APPROVAL STATUS:</b>	Verbal Authorization of Funding from Deputy Regional Administrator
<b>STATUS OF ACTION MEMO:</b>	Pending

### **III. RESPONSE INFORMATION**

#### **A. Situation**

1. See Polrep #1.

#### **B. Actions Taken**

1. During the week of March 29, ERCS continued maintenance activities throughout the facility. Tasks include; daily drum inspections, pumping secondary containment sumps through an on-site Granulated Activated Carbon (GAC) system to remove organic contamination, securing and overpacking leaking drums as needed, and sustaining boiler and compressor operations.
2. During the week of April 5th, the ERCS contractor continued maintenance activities at the facility. With the onset of warmer weather, the heat was turned off in some of the buildings and electrical heat tape and steam tracer lines were removed from some of the piping. Natural gas service, the source of fuel for the boilers has been turned off. This action will result in cost-savings to the government of approximately \$20,000 per month.
3. In addition to the normal maintenance activities, ERCS overpacked 19 leaking drums. ERCS also processed 108,100 gallons of water from the secondary containment areas through the on-site GAC system. Water samples were collected periodically from the on site monitoring/collection station and stored for analysis per the terms and conditions of the Niagara Falls POTW permit.
4. One of the two ERCS foremen was demobilized to another removal action. Rather than have a replacement mobilized, the OSC decided to discontinue the second 12-hour shift and have the remaining second shift individual moved to days. Site security will continue during off site hours.
5. During the week of April 19, ERCS discharged 100,000 gallons of secondary containment water per the terms and conditions of the Niagara Falls POTW permit. Additionally, ERCS processed 30,000 gallons of secondary containment water through an on-site GAC system. ERCS is beginning to process the rainwater from the 1,000 empty drums that remain at the site.

The drums were left outside and have collected a significant amount of potentially contaminated rainwater. The water will be treated through a portable six-cubic foot carbon adsorption system prior to the final polish by the on-site Calgon system. The water will then be pumped into the 100,000 gallon holding tanks pending analysis and subsequent discharge.

6. The OSC and TAT have completed the final generator/drum list. Four hundred & sixty eight PRPs have been identified as having drums at the site. Additional PRPs not reflected in this total are the current owner/operator and past owner/operators. The Vermont, Connecticut, New Hampshire, Massachusetts, and New York manifests divisions have been very helpful in providing manifests to EPA which will substantiate the evidence against the PRPs.
7. During the week of April 26, a tank containing 50,000 gallons of aqueous liquids containing high levels of organic compounds and pesticides developed a leak. The leak was noticed on Monday, April 26 at 0900 hours. The tank was located within a secondary containment area so there was little threat of release into the sanitary sewers. At approximately 0930 hours, the tank leak escalated into an uncontrolled release of approximately 10 gallons/minute. The ERCS maintenance personnel responded quickly. The leak was located at a seam weld at the 25,000 gallon level of the tank. The OSC instructed ERCS to pump the liquid portion of the tank below the leak line. ERCS attempted to cold patch the tank with liquid steel which proved ineffective, TAT monitoring showed no explosive vapors and low organic vapors. Ignitability tests indicated that the water was not flammable. Based on this information, the OSC determined that the tank could be effectively patched by welding. Carbon dioxide was pumped into the tank to purge any oxygen from the tank during the welding. Upon completion of the tank repairs, the previous evacuated tank contents were put back in the tank.

In addition, ERCS overpacked three drums of hazardous substances that were leaking throughout the facility.

### C. Key Issues

1. The NYSDEC is currently revoking the permit for the Frontier facility. As part of the revocation process, the NYSDEC will present their revocation case to an Administrative Law Judge in late May. At this time, the Frontier management company (Eaglevision) will be allowed to present their case as to why the facility should remain open. Eaglevision may present a prospective buyer for the facility, who will need to outline the investors, proposed improvements to the site, and assumption of liabilities (which are in excess of \$10,000,000). A hearing is scheduled during which Eaglevision's case will be presented to the Administrative Law Judge. The NYSDEC has advised the OSC that EPA will be notified when the final hearing date is scheduled.

### D. Future Actions

1. ERCS is presently winterizing the boilers by removing the scale (calcium carbonate) deposits within the boilers and the steam tracer lines. This maintenance is needed because it is anticipated that the boilers will be needed for next winter.
2. The draft consent order and notice letters should be mailed to the PRPs during the week of May 3rd.

### IV. COST INFORMATION:

	Amount Budgeted	Cost To Date Obligated to DCN# 932AKE0004, DCN# 932AKE0010, DCN# 932AKE0031	Amount Remaining Amount Unobligated
Verbal Amount	\$ 900,000	\$ 150,000	\$ 350,000
Cleanup Contractor			
DCN# 932AKE0004	\$ 900,000	\$ 612,000	\$ 288,000
DCN# 932AKE0010			
DCN# 932AKE0031			
<u>EPA/TAT</u>	<u>\$ 250,000</u>	<u>\$ 207,000</u>	<u>\$ 43,000</u>
SITE TOTAL	\$ 1,150,000	\$ 819,000	\$ 331,000
(DCN TOTAL)	\$ 900,000	\$ 612,000	\$ 288,000